

**Via Electronic and Certified Mail**

July 14, 2014

Mr. Stephen Tzhone, Superfund Remedial Project Manager  
Superfund AR/LA Enforcement Section (6SF-RA)  
U.S. Environmental Protection Agency  
1445 Ross Avenue  
Dallas, Texas 75202

**Subject: Monthly Progress Report – June 2014  
Arkwood, Inc. Site, Omaha, Arkansas**

Dear Mr. Tzhone:

Pursuant to Section IX (B) of the corrected Consent Decree in this matter, the following letter report is Millbrook Distribution Services' (MMI) monthly progress report.

**I. CURRENT ACTIVITIES**

The following is a general description of Work (as defined in the Consent Decree) activities commenced or completed during this reporting period:

During June, we operated the main treatment system, collected operational samples and conducted Site maintenance activities. In addition to collecting samples for laboratory analysis of pentachlorophenol, field samples were collected to measure pH, temperature and dissolved oxygen. Water samples were collected on June 4, 2014. The analytical data was forwarded electronically to you and Mr. Mark Moix of the ADEQ at an earlier date and is also attached to this report. A summary of the data is attached for reference. Samples at the spring mouth and weir will continue to be collected once per month until a reduction in frequency is approved by the agency.

Since a Corrected Deed Notice and Restrictions for the Arkwood Site was recorded by Mr. Bud Grisham on May 29, 2014 reducing the restricted area from 30 acres to 18 acres, the placement of the eastern fence will be relocated to be consistent with the boundary of the 18-acre parcel.

The Corrected Deed Notice and Restrictions ensures that engineering controls will remain in place to protect the integrity of the Arkwood remedy.

## II. PROJECT DATA

Attached.

## III. PROJECTED ACTIVITIES

July: MMI plans to continue ongoing operations and Site maintenance activities. We are awaiting receipt of comments from the agencies on the Revised CSM. Once we are in receipt of such comments, we will modify the CSM, as appropriate, and submit a sampling work plan.

August: MMI plans to continue ongoing operations and Site maintenance activities. Upon approval of the dioxin reassessment work plan and supplemental groundwater tracing work plan, implementation of the work plans will be scheduled.

September: MMI plans to continue ongoing operations and Site maintenance activities.

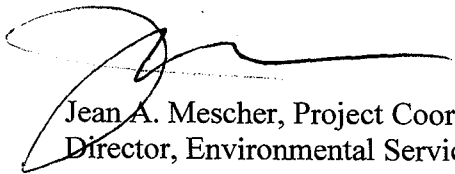
## IV. PROBLEMS ENCOUNTERED OR ANTICIPATED

None.

I certify that the information contained in or accompanying this submission is true, accurate, and complete to the best of my knowledge, information and belief, and that I, as project coordinator, have made reasonable inquiry into its veracity.

If you have any questions regarding this monthly progress report, please do not hesitate to contact me at (608) 848-4134.

Sincerely,



Jean A. Mescher, Project Coordinator  
Director, Environmental Services

Enclosure

Copy:

- Mark Moix, ADEQ
- EPA Assistant Regional Counsel (6C-WA) (w/o enclosure)
- Chief, Superfund Enforcement Branch (6H-E) (w/o enclosure)

## Arkwood, Inc. Site: Ozone Injection Pilot Study

Date	Variables		Spring	PCP	
	Water Inj	O3 Inj	Flow	Mouth	Weir
12/8/05			5		
12/9/05	35		5		
12/14/05	35	1lb/10 g	21	28	
12/15/05	35	1lb/10 g	30/27	29.3	
12/20/05	36	1lb/10 g	27	7.39	<5.10
12/26/05	36	1lb/10 g	27	11.4	11.1
1/2/06	36	1lb/10 g	21	42.4	35.1
1/9/06	36	1lb/10 g	20	32.4	33
1/16/06	36	1lb/10 g	27.5	32.3	<5.00
1/23/06	36	1lb/10 g	34/32	15.9	<5.00
1/30/06	36	1lb/10 g	41	34.3	<5.00
2/6/06	36	1lb/10 g	38	<5.10	<5.00
2/13/06	36	1lb/10 g	34	23.9	<5.00
2/20/06	36	1lb/10 g	21	5.53	4.19J
2/27/06	36	1lb/10 g	26	19.9	<5.00
3/6/06	34	1-2lb/10 g	16	25.1	<5.00
3/13/06	33	1-2lb/10 g	57	107	<5.00
3/20/06	32	1-2lb/10 g	48	26.2	<5.00
3/27/06	32	1-2lb/10 g	27	4.09J	<5.00
4/3/06	34	2-3lb/10 g	24	11.3	<5.00
4/10/06	33	2-3lb/10 g	16.4	39.3	<5.00
4/17/06	34	2-3lb/10 g	22	7.94	7.82
4/24/06	35	2-3lb/10 g	16	7.0	<5.00
4/27/06	33	2-3lb/10 g	50	11.3	NA
4/29/06	33	2-3lb/10 g	193	28.2	NA
5/1/06	33	2-3lb/10 g	94	23.4	7.16
5/8/06	33	2-3lb/10 g	59	52.3	23.3
5/15/06	34	2-3lb/10 g	21.7	14.9	<5.00
5/22/06	34	2-3lb/10 g	16	<5.00	<5.00
5/30/06	34	2-3lb/10 g	16.7	5.64	<5.00
6/7/06	0	0	3	253	<5.00
6/12/06	0	0	2.19	LE	LE
6/19/06	34	0	16.7	52.1	14.3
6/26/06	34	0	16.7	74.7	<5.00
7/5/06	35	0	21.7	9.8	<5.00
7/17/06	34	0	16.7	21.9	4.01J
8/7/06	34	0	16.7	23.6	18
8/14/06	34	0	16.7	<5.00	5.22
9/5-6/06	34	0	23	6.57	<5.10
9/18/06	34	0	24	6.29	<5.00
10/2/06	34	0	24	16.8	<5.00
10/16/06	34	2-3lb/10 g	41	39.6	2.22J
10/16/06	34	5-6lb/10g	81	92.3	19.4
10/18/06	34	5-6lb/10g	27	118	<5.00
11/7/06	35	2-4lb/10g	41	52.7	4.70J
11/20/06	35	2-4lb/10g	24	57.4	<5.00
11/30/06	35	5-6lb/10g	636	<50.0	<5.00
12/4/06	35	5-6lb/10g	59	<54.3	<5.00
12/6/06	35	5-6lb/10g	37	<52.6	<5.00
12/18/06	35	2-3lb/10 g	21	24.1	<5.00
1/8/07	35	2-3lb/10 g	21	16.7	<5.00
1/22/07	35	2-3lb/10 g	79	34.6	<5.00
2/5/07	35	2-3lb/10 g	27	25.9	<5.00
2/19/07	35	2-3lb/10 g	47	19.6	<5.00
3/5/07	35	2-3lb/10 g	27	<5.00	<5.00
3/19/07	35	2-3lb/10 g	25	NA	NA
4/9/07	35	2-3lb/10 g	23	<5.00	<5.00
4/23/07	35	2-3lb/10 g	30	7.27	<5.00
5/7/07	35	2-3lb/10 g	21	2.90J	<5.00
5/21/07	35	2-3lb/10 g	20	4.36J	<5.00
6/4/07	35	2-3lb/10 g	20	<5.00	<5.00
6/18/07	35	0	21	9.62	<5.00
7/9/07	35	0	20	15.0	<5.00

7/23/07	35	0	18	8.65	<5.00
8/6/07	0	0	1	191	9.19
9/10/07	35	0	23	217	26.4
9/24/07	35	0	18	16.2	19.4
10/10/07	35	2-3lb/10 g	18	5.63	1.15J
10/22/07	35	2-4lb/10g	18	1190	53.7
11/5/07	35	2-4lb/10g	18	209	7.93
11/19/07	35	2-4lb/10g	18	19.8	24.1
12/3/07	35	2-4lb/10g	18	20.1	<5.00
12/17/07	36	2-4lb/10g	32	87.4	1.20J
1/7/08	36	2-4lb/10g	23	<5.00	<5.00
1/21/08	36	2-4lb/10g	23	58	<5.00
2/4/08	36	2-4lb/10g	24	52	<5.00
2/18/08	35	2-4lb/10g	83	57	15
3/3/08	35	5-6lb/10g	580	<5.00	<5.00
3/17/08	35	5-6lb/10g	44	11	<5.00
4/7/08	35	5-6lb/10g	78	10	<5.00
4/12/08	35	5-6lb/10g	240	6.5	NA
4/13/08	35	5-6lb/10g	100	6.8	NA
4/14/08	35	5-6lb/10g	78	8.2	NA
5/10/08	36	5-6lb/10g	68	75	<5.00
5/27/08	0	0	18	189	<5.00
6/9/08	35	2-4lb/10g	30	77	<5.00
6/23/08	35	2-4lb/10g	580	5.6	<5.00
7/7/08	35	2-4lb/10g	80	194	189
7/10/08	35	5-6lb/10g	140	254	20
7/21/08	35	5-6lb/10g	42	477	<5.00
8/4/08	35	2-4lb/10g	22	108	14
8/18/08	35	2-4lb/10g	36	31	<5.00
9/1/08	35	2-4lb/10g	25	32	<5.00
9/22/08	35	2-4lb/10g	40	22	<5.00
10/6/08	35	2-4lb/10g	21	20	<5.00
10/20/08	33	2-4lb/10g	21	13	<5.00
11/3/08	35	2-4lb/10g	24	<5.00	<5.00
11/17/08	35	2-4lb/10g	30	28	<5.00
12/1/08	35	2-4lb/10g	24	12	<5.00
12/22/08	33	2-4lb/10g	24	<5.00	<5.00
1/5/09	35	2-4lb/10g	32	7.3	<5.00
1/26/09	32	2-4lb/10g	27	<5.00	<5.00
2/9/09	33	2-4lb/10g	90	<5.00	<5.00
2/23/09	33	2-4lb/10g	31	6	<5.00
3/9/09	34	2-4lb/10g	30	5.7	<5.00
3/23/09	33	2-4lb/10g	30	<5.00	<5.00
4/6/09	32	2-4lb/10g	38	5.8	<5.00
4/20/09	32	2-4lb/10g	243	8.5	<5.00
5/4/09	33	2-4lb/10g	343	8.2	8.7
5/18/09	33	2-4lb/10g	51	6.2	<5.00
6/8/09	35	2-4lb/10g	38	<5.00	<5.00
6/29/09	33	2-4lb/10g	25	9.1	<5.00
7/20/09	32	2-4lb/10g	47	39	<5.00
8/10/09	32	2-4lb/10g	23.7	31	<5.00
9/13/09	32	0	22	8	<5.00
10/12/09	32	0	104	21	<5.00
11/9/09	32	0	45	<50	<5.00
12/7/09	32	0	28	8.2	<5.00
1/10/10	32	0	42	13	<5.00
2/15/10	32	0	87	11.1	<5.00
3/15/10	32	0	35	<5.00	<5.00
4/15/10	32	0	40	9.62	<5.00
5/17/10	32	0	180	11	<5.00
6/13/10	32	0	43	15	<5.00
7/8/10	32	0	33	66	<2
8/19/10	0-20	0	17	16.3	<5.00
9/21/10	34	0	33	28.2	<5.00
10/18/10	37	0	20	14.9	<10.00
11/20/10	37	0	21	4.89	<4.00
12/16/10		0	23.55	6.15	<5.00





11701 I-30 Bldg 1, Ste 115 - Little Rock, AR 72209  
501-455-3233 Fax 501-455-6118

12 June 2014

Jim Fleer  
Oxford Environmental & Safety, Inc  
14348 Nieman Rd.  
Overland Park, KS 66221

RE: Arkwood Monthly Sampling

SDG Number: 1406047

Enclosed are the results of analyses for samples received by the laboratory on 05-Jun-14 09:10. If you have any questions concerning this report, please feel free to contact me.

Sample Receipt Information:

Custody Seals	✓
Containers Correct	✓
COC/Labels Agree	✓
Received On Ice	✓
Temperature on Receipt	3.0°C

Sincerely,

*Norma James / Teresa Coins*

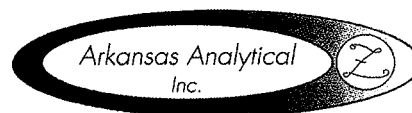
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Norma James  
President

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12 June 2014

Jim Fleer  
Oxford Environmental & Safety, Inc  
14348 Nieman Rd.  
Overland Park, KS 66221  
Project: Arkwood Monthly Sampling



Date Received: 05-Jun-14 09:10

## CASE NARRATIVE

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Sample Delivery Group – 1406047

One or more of the qualifiers described below may appear in this report.

### QUALITY CONTROL QUALIFIERS:

<u>Qualifier</u>	<u>Description</u>
E20	Sample used as "parent" for the associated analytical batch.
%D3/S-01 / E1	Surrogate failed to recover within acceptance criteria (%D3/S-01). Results associated with this surrogate were qualified as "estimated" (E1).
B	Present in the Associated Blank
B1	Present in Blank, but Not In the Sample.
%D2 / E5	Laboratory Control Spike (LCS) and/or Laboratory Control Spike Duplicate (LCSD) failed to recover with acceptance criteria (%D2). Associated results were qualified as "estimated" (E5).
%D1	Matrix Spike (MS) and/or Matrix Spike Duplicate (MSD) failed acceptance criteria.
MBA	Matrix Spike (MS) and/or Matrix Spike Duplicate (MSD) failed criteria due the high concentration of analyte in the parent sample.
MBI	Matrix Spike (MS) and/or Matrix Spike Duplicate (MSD) failed criteria due an interference in the parent sample.
%D3	Quality Control Surrogate failed acceptance criteria.

12 June 2014

Jim Fleer  
Oxford Environmental & Safety, Inc  
14348 Nieman Rd.  
Overland Park, KS 66221  
Project: Arkwood Monthly Sampling



Date Received: 05-Jun-14 09:10

#### ANALYTICAL RESULTS

Lab Number: 1406047-01  
Sample Name: Mouth  
Date/Time Collected: 6/4/14 11:30  
Sample Matrix: Water

<u>Semivolatiles</u>	<u>Units</u>	<u>Result</u>	<u>Qualifier(s)</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
Pentachlorophenol	ug/L	65.7		6/10/14 13:37	A406112	8270D
2,4,6-Tribromophenol [surr]	%	114		6/10/14 13:37	A406112	8270D
2-Fluorobiphenyl [surr]	%	86.0		6/10/14 13:37	A406112	8270D
2-Fluorophenol [surr]	%	58.0		6/10/14 13:37	A406112	8270D
Nitrobenzene-d5 [surr]	%	93.3		6/10/14 13:37	A406112	8270D
Phenol-d5 [surr]	%	45.1		6/10/14 13:37	A406112	8270D
Terphenyl-d14 [surr]	%	104		6/10/14 13:37	A406112	8270D

#### ANALYTICAL RESULTS

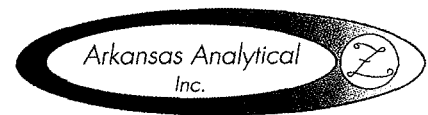
Lab Number: 1406047-02  
Sample Name: Weir  
Date/Time Collected: 6/4/14 11:00  
Sample Matrix: Water

<u>Semivolatiles</u>	<u>Units</u>	<u>Result</u>	<u>Qualifier(s)</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
Pentachlorophenol	ug/L	< 1.00	E1	6/10/14 12:33	A406112	8270D
2,4,6-Tribromophenol [surr]	%	0.110	%D3	6/10/14 12:33	A406112	8270D
2-Fluorobiphenyl [surr]	%	81.8		6/10/14 12:33	A406112	8270D
2-Fluorophenol [surr]	%		%D3	6/10/14 12:33	A406112	8270D
Nitrobenzene-d5 [surr]	%	93.9		6/10/14 12:33	A406112	8270D
Phenol-d5 [surr]	%	1.32	%D3	6/10/14 12:33	A406112	8270D
Terphenyl-d14 [surr]	%	95.4		6/10/14 12:33	A406112	8270D



12 June 2014

Jim Fleer  
Oxford Environmental & Safety, Inc  
14348 Nieman Rd.  
Overland Park, KS 66221  
Project: Arkwood Monthly Sampling



Date Received: 05-Jun-14 09:10

## QUALITY CONTROL RESULTS

### Semivolatiles - Quality Control Analyzed: 10-Jun-14 12:54 By: TB

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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#### Batch A406112 - 3510C Modified

##### Blank (A406112-BLK1)

Prepared & Analyzed: 10-Jun-14

Pentachlorophenol	ND	1.00	ug/L							
Surrogate: 2,4,6-Tribromophenol	36.6		"	40.0		91.4	45.3-139			
Surrogate: 2-Fluorophenol	26.8		"	40.0		66.9	28.9-81.6			
Surrogate: Phenol-d5	20.5		"	40.0		51.2	8.43-107			

##### LCS (A406112-BS1)

Prepared & Analyzed: 10-Jun-14

Pentachlorophenol	29.9	1.00	ug/L	40.0		74.8	44.6-120			
Surrogate: 2,4,6-Tribromophenol	42.9		"	40.0		107	60.1-131			
Surrogate: 2-Fluorophenol	24.1		"	40.0		60.4	30.7-98.1			
Surrogate: Phenol-d5	20.4		"	40.0		50.9	22.7-123			

##### Matrix Spike (A406112-MS1)

Source: 1406047-01

Prepared & Analyzed: 10-Jun-14

Pentachlorophenol	145	2.00	ug/L	80.0	65.7	99.0	31-128			
Surrogate: 2,4,6-Tribromophenol	85.3		"	80.0		107	43-136			
Surrogate: 2-Fluorophenol	47.9		"	80.0		59.9	23.6-97.1			
Surrogate: Phenol-d5	38.4		"	80.0		48.0	12.8-122			

##### Matrix Spike Dup (A406112-MSD1)

Source: 1406047-01

Prepared & Analyzed: 10-Jun-14

Pentachlorophenol	153	2.00	ug/L	80.0	65.7	110	31-128	5.64	22.7	
Surrogate: 2,4,6-Tribromophenol	85.3		"	80.0		107	43-136			
Surrogate: 2-Fluorophenol	52.7		"	80.0		65.9	23.6-97.1			
Surrogate: Phenol-d5	42.2		"	80.0		52.8	12.8-122			

## QUALIFIER(S)

\*%D3: Surrogate Percent Recovery Does Not Meet Laboratory Acceptance Criteria

\*E1: Estimated Result Due to Surrogate Failure

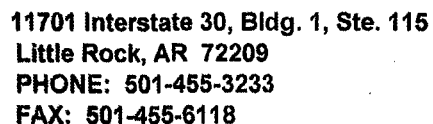
All Analysis performed according to EPA approved methodology when available:

SW 846, Revised December, 1996; EPA 600/4-79-020, Revised March, 1983; Standard Methods.

Instrument calibration and quality control samples performed at or above frequency specified in analytical method.

Reviewed by:

*Norma James / Teresa Coins*  
Norma James and/or Teresa Coins  
Technical Director and/or QA Officer

[illegible]